

SUPERIOR COURT OF NEW JERSEY

RECD

2003

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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ 471-02-1(3)

Superior Court

Docket Number

03-01-00009-S

STATE OF NEW JERSEY)

INDICTMENT

v.)

VICTOR GARCIA)

JOSUE GONZALEZ)

MARIETTA LEWIS)

RAMON FIGUEROA)

and)

CHRISTIAN MALDONADO)

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Conspiracy - Third Degree)

VICTOR GARCIA

JOSUE GONZALEZ

MARIETTA LEWIS

RAMON FIGUEROA

and

CHRISTIAN MALDONADO

who are named as defendants herein, Iris Salkauski, who is a
conspirator but who is not named as a defendant herein, between
on or about October 14, 1997, and on or about July 1, 1999, at

the City of Camden, at the Townships of Cherry Hill and Pennsauken, all in the County of Camden, at the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the crime of theft by deception, did agree that:

- A. One or more of them would engage in conduct which would constitute the aforesaid crime or an attempt or solicitation to commit such crime; or
- B. One or more of them would aid in the planning, attempt, solicitation or commission of said crime, that is:
 - 1. Purposely obtain the property of another in excess of \$500 by deception, in violation of N.J.S.A. 2C:20-4.

The Grand Jurors aforesaid, upon their oaths, do further present that in pursuance of the said conspiracy, the following Overt Acts, among others, were committed:

OVERT ACTS

- 1. On or about October 14, 1997, at the City of Camden, in the County of Camden, the said CHRISTIAN MALDONADO was the driver of a vehicle involved in a staged collision.
- 2. On or about October 14, 1997, at the City of Camden, in the County of Camden, the said RAMON FIGUEROA was the driver of a vehicle involved in a staged collision.

3. On or about October 14, 1997, at the City of Camden, in the County of Camden, the said VICTOR GARCIA was an occupant in vehicle involved in a staged collision.
4. On or about October 14, 1997, at the City of Camden, in the County of Camden, the said JOSUE GONZALEZ was an occupant in vehicle involved in a staged collision.
5. On or about October 14, 1997, at the City of Camden, in the County of Camden, the said MARIETTA LEWIS was an occupant in vehicle involved in a staged collision.

All contrary to the provisions of N.J.S.A 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Theft by Deception - Third Degree)

VICTOR GARCIA

JOSUE GONZALEZ

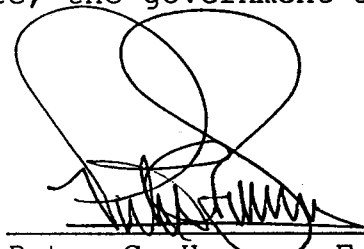
and

MARIETTA LEWIS

between on or about October 14, 1997, and on or about July 1, 1999, at the City of Camden, at the Townships of Cherry Hill and Pennsauken, all in the County of Camden, at the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did purposely obtain or attempt to obtain property of another, in excess of \$500, by deception, that is, the said VICTOR GARCIA, JOSUE GONZALEZ and MARIETTA LEWIS did purposely obtain or attempt to obtain the property of Allstate Insurance Company in excess of \$500 by creating or reinforcing the false impression that an automobile collision that occurred in the City of Camden on October 14, 1997 was accidental; and that Personal Injury Protection (PIP) insurance claims and insurance claims for non-economic losses were compensable pursuant to automobile insurance policies in connection with the planned and staged automobile collision;

WHEREAS, IN TRUTH AND IN FACT, as the said VICTOR GARCIA, JOSUE GONZALEZ and MARIETTA LEWIS well knew, the automobile collision which occurred in the City of Camden on October 14, 1997 was not accidental, but was planned and staged, and the

Personal Injury Protection (PIP) insurance claims and insurance claims for non-economic losses submitted to Allstate Insurance Company were not compensable in connection with the planned and staged automobile collision, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:5-1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



Peter C. Harvey, F.A.A.G
Director
Division of Criminal Justice

A TRUE BILL:


_____, Foreperson

Dated: 1/13/03